

Fw: Sheldon SOB NPDES for Oil and Gas

Elaine Lai to: Peggy Livingston

02/02/2011 05:40 PM

From: Elaine Lai/R8/USEPA/US

To:

I had to call Wes for his thoughts and thought I would pass this along...

----- Forwarded by Elaine Lai/R8/USEPA/US on 02/02/2011 05:40 PM -----

From: Weston Wilson <anwwilson@comcast.net>
To: Elaine Lai/R8/USEPA/US@EPA
Date: 02/02/2011 05:37 PM
Subject: Re: Sheldon SOB NPDES for Oil and Gas

here's my thoughts...

The effluent guideline further requires "...that the produced water is of good enough quality to be used for wildlife or livestock watering or other agricultural uses and that the produced water is actually put to such use during periods of discharge."

So what irrigator/rancher is actually putting this to use, 'actually put to use] doesn't mean it can be, or might be, it must be consumed, for example all the outflow goes to an irrigated hayfield -- one can't meet this test under Part 435 unless there is actual use, real use, not just a 'passing antelope or cow' walking by... see if you can find any other NPDES oil/gas discharge applications for part 435 that were denied on this basis -- ask Nathan for a tribal water quality person that may have denied an application of this basis -- try Ft. Peck or Ute Mtn Utes or Navajos.

call Carey Johnston in HQs, 202-566-1014 he worked with Brad Crowder and me on the BPJ and ELG for coal bed methane produced water -- I trust him -- ask him for other peers in Regions 9 and 10 -- also you might call Amy Mall at NRDC and ask her the same question --

second you ask the right/key question in the draft SOB, what is in the frack and acid fluids???

Since Wyoming has a reporting rule, since last Sept., requiring frack fluid chemical disclosure, has this been done here, in this field by the same company -- or perhaps done nearby in the same field by the same company but not on the Wind River Res -- the SOB should publish the actual chemicals used, their volume per frack job, % by weight of each chemical, toxicity of that chemical if known, and specify the CAS number. It (the SOB) is maddening vague right now how about when/how often fracing occurs, and no info what so ever what chemicals are in the frac fluids --

Produced water -- last permit was not to exceed 5000 (for that passing cow again), yet the average TDS is over that --- what gives on that point?

I see in the other SOB that these discharges must pass a Whole Effluent Toxicity test. What is the WET result in the past for this same outfall? Did those little cyriadaphia live or die? Also the other

SOB includes BTEX compounds, what was the BTEX results for this one == hard for me to believe that with residual oil and grease on the skim pond that this effluent could pass the less than 5 ppb benzene MCL.

also noticed that the other SOB had no citizen responses, perhaps you should call Dan Heilig of WRA or Steve Jones of WOC and see if those organizations commented on any other similar 435 permits in Wyo. -- on or off the reservation, doesn't matter.

good luck, this stuff ought to be injected, not dumped...

Wes

On Feb 2, 2011, at 2:30 PM, Lai.Elaine@epamail.epa.gov wrote:

<Phoenix_SheldonDome_Field_SOB.docx>